Safeguarding Policy

Written by	**Harriet Carter**	**September 2026**
Next review due by		**September 2027**

What to do if you have a welfare concern in Earley Springs

Why are you concerned?

For Example:

- Something a child has said - e.g allegation of harm
- Child's appearance - may include unexplained marks/bruises as well as dress
- Behaviour change(s)
- Witnessed concerning behaviour

Act immediately and record your concerns. If urgent, speak to a DSL first.

- Follow the school procedure using Bromcom
- Reassure the child
- Clarify any concerns using open questions, if necessary (TED: Tell, Explain, Describe)
- Record of facts and not opinions and use child's own words. Sign and dat your record
- Seek support for yourself as required from DSL

Inform the Designated Safeguarding Lead: Emily Jenkins

Designated Safeguarding Lead

- If a child is at risk of immediate harm and/or is unsafe to go home, make an urgent **Request for Support to the Front Door Service** via the portal - https://www.kscmp.org.uk/guidance/worried-about-a-child or call the Police on 999.
- If no immediate risk of ham, provide internal support and/or refer to other agencies in line with **Kent Safeguarding Support Level Guidance and KSCMP procedures** - https://www.kscmp.org.uk/ as appropriate. For example, signposting to community services and/or early help open access, a non-urgent call to the Police via 101, reporting allegations against staff to the County LADO service, or make a Request for Support via the **Front Door Service Portal** - https://www.kscmp.org.uk/guidance/worried-about-a-child
- Where the school/college is unsure, advice can be sought from a Local Authority Social Worker at the Front Door Service via **03000411111**
- Where support is required out of working hours, contact the Out of Hours Service via **03000419191.**

If you are unhappy with the response

Staff:

- Follow Kent safeguarding partnership escalation procedures - https://www.kscmp.org.uk/
- Follow Earley Springs Whistleblowing procedures

Learners and Parents:

- Follow school complaints procedures.

Record decision making and action taken using Bromcom

Monitor

Be clear about:

- What you are monitoring e.g. behaviour trends, appearance
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and **request further support** (if necessary)

At all stages, the child's circumstances will be kept under review. The DSL/Staff will request further support if required to ensure the **child's safety** is **paramount.**

Safeguarding Contacts

Designated Safeguarding Lead (DSL)
Emily Jenkins

Deputy DSLs
Harriet Carter
Sue Carter
Hannah Mawston

Executive Board Safeguarding Link
Joanna Donnegan Edwards

Kent Integrated Front Door
03000 411111

Kent LADO
03000 410888

Emergency Services
999

Prevent / Channel Referral
Via DSL and Kent Prevent Team

NSPCC Whistleblowing
0800 028 0285

Ofsted Whistleblowing
0300 123 1231

1. Objectives

Earley Springs School is committed to safeguarding and promoting the welfare of every child. Safeguarding is everyone's responsibility and is embedded within the culture, practice and decision-making of the school.

We maintain an attitude of “it could happen here” and expect all staff to act immediately where they have concerns about a child's welfare. The school will provide a safe environment in which children can learn, communicate and develop; identify children who may benefit from early help; protect children from maltreatment, abuse, neglect and exploitation; and take prompt and proportionate action where concerns arise.

As a specialist school for children with communication and interaction needs, Earley Springs recognises that communication differences must never become a barrier to safeguarding. Staff will presume competence, remain professionally curious and recognise that children may communicate distress, disclosure or concern through speech, behaviour, AAC, spelling, gesture, body language or other individual methods of communication.

2. Legal and Regulatory Framework

This policy is underpinned by the following key documents:

This policy has been developed with regard to the statutory and regulatory framework applying to Earley Springs School as an independent special school. It should be read and implemented in accordance with current national and local safeguarding guidance.

The principal legislation and statutory guidance underpinning this policy include:

- Keeping Children Safe in Education 2026 (KCSIE)
- Working Together to Safeguard Children 2026
- Education (Independent School Standards) Regulations 2014, particularly Part 3, paragraph 7
- Children Act 1989
- Children Act 2004
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006, as amended
- Protection of Freedoms Act 2012
- Childcare Act 2006 and Childcare (Disqualification) Regulations 2018, where applicable
- Counter-Terrorism and Security Act 2015, including the Prevent duty
- Female Genital Mutilation Act 2003, as amended by the Serious Crime Act 2015
- Domestic Abuse Act 2021
- Human Rights Act 1998
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- current DfE guidance relating to information sharing, online safety, attendance, behaviour, searching, screening and confiscation, and safer recruitment.

Earley Springs also follows the safeguarding arrangements, procedures and thresholds established by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) and works with Kent County Council Children's Services, Kent Police, health services and other safeguarding partners as required.

2.1 Independent School Standards Compliance

Earley Springs School recognises its statutory duties under the Education (Independent School Standards) Regulations 2014 and confirms that this policy supports compliance with:

• Part 3, paragraph 7 – arrangements are made to safeguard and promote the welfare of pupils at the school; these arrangements have regard to guidance issued by the Secretary of State and are implemented effectively.
• Part 4 – suitability of proprietors, staff and supply staff.
• Part 5 – premises and accommodation arrangements which support safeguarding.
• Part 8 – leadership and management actively promote pupil wellbeing and ensure independent school standards are met consistently.

This policy should be read alongside the school's Safer Recruitment Policy, Staff Code of Conduct, Whistleblowing Policy, Child-on-Child Abuse Policy, Behaviour Policy,

Attendance Policy, Acceptable Use Policy, Mobile and Smart Technology Policy, Positive Handling and Physical Intervention Policy, Site Access and Security Policy, Health and Safety Policy and other relevant safeguarding procedures.

3. Key Definitions

- **Safeguarding and promoting the welfare of children** means providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
- **Child-on-child abuse:** Abuse of a child by another child or children. It can take place inside or outside school and online and may include bullying, abuse within intimate personal relationships, physical abuse, sexual violence, sexual harassment, consensual and non-consensual sharing of nude and semi-nude images, upskirting and initiation or hazing-type behaviour.
- **Exploitation:** Where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal or sexual activity or other harmful activity. Exploitation may occur even where activity appears consensual and may take place in person or through technology.
- **Child Protection:** A subset of safeguarding, specifically focusing on preventing and responding to situations where children are at significant risk of harm.
- **Abuse:** Any form of maltreatment of a child, including physical, emotional, sexual abuse, and neglect. (Refer to Appendix 1 for detailed definitions.)
- **Neglect:** A form of abuse characterised by the persistent failure to meet a child's basic physical and/or psychological needs, potentially leading to serious harm to their development. (Refer to Appendix 1 for further details.)
- **Sharing of Nudes and Semi-Nudes (Sexting):** The exchange of nude or semi-nude images, videos, or live streams among children.
- **Children:** Individuals under the age of 18.
- **Safeguarding Partners:** As defined in the Children Act 2004, these include:
    - Local Authority (LA)
    - Integrated Care Board (ICB) within the LA area
    - Chief Officer of Police for the local police area
- **Terminology:** While "victim" is a commonly used term, we acknowledge that not all individuals who have experienced abuse identify as victims. We will use terminology that aligns with the child's preferences and comfort level. Similarly, the terms "alleged perpetrator" and "perpetrator" will be used judiciously, recognizing that abusive behavior can also have negative impacts on the individual exhibiting it.

4. Key Responsibilities

Safeguarding and child protection are a shared responsibility. This policy applies to all staff, volunteers, and members of the Executive Board at Earley Springs and aligns with the

procedures of the three local safeguarding partners. This policy applies to all school activities delivered by Earley Springs, including educational visits, therapeutic provision, enrichment activities and any commissioned services delivered on behalf of the school.

Earley Springs plays a crucial role in preventative education. This is embedded within a whole-school approach that prepares pupils for life in modern Britain and fosters a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment.

4.1. All Staff Responsibilities all staff will:

- All staff will read and understand Part One of Keeping Children Safe in Education 2026 and will receive appropriate safeguarding and child protection training at induction, which is regularly updated. Staff will receive safeguarding and child protection updates, including online safety, as required and at least annually.
- Acknowledge understanding: Sign a declaration at the beginning of each academic year confirming their review of the guidance.
- Promote online safety: Emphasise online safety when communicating with parents, informing them about online activities and interactions expected of their children.
- Create a safe space: Provide a safe and supportive environment for LGBTQ+ pupils to express their concerns.

All staff will be familiar with:

- Safeguarding systems: Earley Springs' safeguarding systems, including this child protection and safeguarding policy, the staff code of conduct, the roles of the Designated Safeguarding Lead (DSL) and deputy DSL, the behavior policy, the online safety policy, and the safeguarding response to children missing from education.
- Staff will understand their role in identifying children who may benefit from early help and support, including recognising emerging needs, sharing concerns promptly with the DSL and contributing to multi-agency assessment and support where appropriate.
- Referral Process: Be familiar with the process for making referrals to local authority children's social care and for subsequent statutory assessments, including their potential role in these processes.
- Recognising and Responding to Safeguarding Concerns: Know how to identify and respond to safeguarding concerns, including child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of risk from or involvement in serious violent crime, FGM, radicalisation, and serious violence (including county lines). Understand how to recognise signs of different types of abuse and neglect, including FGM.
- Supporting Victims: Reassure victims that they are being taken seriously and will be supported and kept safe.
- Recognising Risk: Understand that children can be at risk of harm both inside and outside the home, at school, and online.
- Addressing LGBTQ+ Concerns: Recognize that LGBTQ+ children may face specific vulnerabilities and require appropriate support.

- Identifying Children in Need: Understand how to identify children who require additional support or protection. Section 5 and Appendix 4 of this policy provide further guidance on this.

Earley Springs recognises that many pupils communicate in ways that differ from conventional spoken communication. A child's speech, language, learning disability or communication presentation must never be used to make assumptions about their understanding, credibility or ability to experience or communicate abuse.

Staff will presume competence and remain alert to changes in behaviour, regulation, communication, engagement, presentation and emotional wellbeing that may indicate a safeguarding concern. Pupils will be supported to communicate using their established and preferred communication methods, which may include speech, gesture, visuals, AAC, spelling or other individual communication systems.

Staff must not interpret behaviour that may indicate distress or harm solely as a feature of a child's SEND without further consideration. Where there is uncertainty, staff will exercise professional curiosity and discuss the concern with the DSL.

4.2. Executive Board Responsibilities The Executive Board will:

- Champion Safeguarding: Foster a whole-school approach to safeguarding, ensuring it is integrated into all relevant policies and procedures.
- Policy Oversight: Evaluate and approve this policy during each review, ensuring compliance with legal requirements and holding the Headteacher accountable for ensuring safeguarding systems are implemented effectively, based on assurance provided by the DSL.
- Legal and Ethical Compliance: Be aware of obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the school's local multi-agency safeguarding arrangements.
- Safeguarding Monitoring: Appoint a senior board member (distinct from the DSL) to monitor the effectiveness of this policy.
- Support for the DSL: Ensure the DSL has the necessary authority, time, funding, training, resources, and support to effectively fulfill their role.
- Online Safety: Prioritise online safety within the whole-school safeguarding approach, including effective management of IT filters and monitoring systems.
- Addressing Staff Concerns: Establish procedures for managing any safeguarding concerns or allegations (including low-level concerns) regarding staff members (including supply staff, volunteers, and contractors). Appendix 3 of this policy outlines this procedure.
- Addressing Specific Needs: Recognize that children with SEND or specific medical or physical health conditions may face additional vulnerabilities.
- External Service Providers: When engaging external service providers, ensure they have appropriate safeguarding policies and procedures in place and establish clear communication channels for safeguarding matters.

- Headteacher Allegations: Act as the "case manager" in the event of an allegation of abuse against the headteacher, as appropriate (see Appendix 3).
- Executive Board members will receive appropriate safeguarding and child protection training at induction, which will equip them with the knowledge required to provide effective strategic challenge and assurance. The Executive Board will ensure that it understands the safeguarding responsibilities placed upon the Proprietor and school by KCSIE 2026 and the Independent School Standards.

The Executive Board will receive regular safeguarding assurance information including:

• Safeguarding reports and trend analysis
• DSL supervision records
• Safeguarding training compliance
• Single Central Record audits
• Attendance and persistent absence information
• Filtering and monitoring reports
• Behaviour and restraint analysis
• Complaints and low-level concerns
• Safeguarding audits and action plans

4.3. Designated Safeguarding Lead (DSL) Responsibilities

- **Emily Jenkins** is the Designated Safeguarding Lead (DSL).
- The DSL is available for staff to discuss safeguarding concerns.
  The DSL (or a Deputy DSL) will always be available during term time and school hours for staff to discuss safeguarding concerns. Out-of-hours contact details will be provided for emergencies.
- **Out-of-Hours Contact:** Contact details for the DSL will be provided for out-of-hours emergencies.
- **Deputy DSL:** They will act as the cover DSL during the absence of the primary DSL.
- **Oversight:** The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety).
- **Support and Guidance:** The DSL will provide advice and support to other staff on child welfare and child protection matters.
- **Multi-agency Collaboration:** The DSL will participate in strategy discussions and inter-agency meetings, or support other staff in doing so.
- **Child Assessment:** The DSL will contribute to the assessment of children.
- **Referrals:** The DSL will refer suspected cases to the appropriate authorities (local authority children's social care, Channel program, Disclosure and Barring Service, and/or police) and support staff in making such referrals.
- **Harmful Sexual Behaviour:** The DSL will have a good understanding of harmful sexual behaviour.
- **Supporting Victims:** The DSL will ensure victims are reassured, supported, and kept safe.
- **Keeping the Headteacher Informed:** The DSL will keep the Headteacher informed of safeguarding matters where operational action or leadership oversight is required.

- **Liaison with Agencies:** The DSL will liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- **Accessing Support:** The DSL will be aware of and have access to specialist support services for all children involved in cases of sexual violence and sexual harassment.
- **Appropriate Adults:** The DSL will be aware of the importance of an "appropriate adult" to support children during police investigations or searches.
- **Training and Development:** The DSL will undergo regular and up-to-date training to maintain their knowledge and skills. Deputy DSLs will receive equivalent training.

The DSL reports safeguarding performance and concerns directly to the Executive Board Safeguarding Link Lead, who provides strategic oversight on behalf of the Executive Board. The Executive Board reports to and is monitored by the Proprietor to ensure full accountability for safeguarding across the school.

The DSL's full responsibilities are outlined in their job description.

- Training and Development: The DSL will undergo regular and up-to-date training to maintain their knowledge and skills. Deputy DSLs will receive equivalent training.
- Multi-agency Working: Earley Springs recognises the importance of multi-agency working and is committed to collaborating with partner agencies to provide a coordinated response to safeguarding concerns. This includes active participation in the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) processes, such as attending relevant safeguarding meetings (e.g., Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings).

The Designated Safeguarding Lead holds operational responsibility for safeguarding and child protection. Strategic oversight, monitoring, and challenge of safeguarding effectiveness sit with the Executive Board through its Safeguarding Link Lead. This separation ensures there is no overlap between operational delivery and strategic oversight.

4.4. The Headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the website

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Ensuring all safer recruitment procedures are followed, including the completion and recording of all required pre-employment checks for staff, volunteers, and contractors, in line with KCSIE and the Independent School Standards.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable

- Ensuring that safeguarding and child protection records are maintained accurately, securely, and in accordance with statutory guidance and data protection principles.
- Reporting regularly to the Executive Board on safeguarding activity, training compliance, and any emerging patterns or trends, to support effective oversight and accountability.

5. Child Protection Procedures

Earley Springs is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. The DSL, Deputy DSLs and relevant school leaders will maintain an up-to-date understanding of Keeping Children Safe in Education 2026, including the additional information within Annex B concerning specific safeguarding issues.

Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 5 of this policy and speak with the DSL or a deputy.

5.1. Recognising Abuse and Taking Action

Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral.

Tell the DSL as soon as possible if you make a referral directly.

For reporting child abuse to your local council:

https://www.kent.gov.uk/education-and-children/kent-family-hub/keep-your-family-safe/report-child-abuse

To make an immediate referral to LADO:
https://www.kscmp.org.uk/procedures/local-authority-designated-officer-lado

5.2. If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Add incident to Bromcom. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 5.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

- Information sharing will be carried out in line with statutory guidance, respecting confidentiality and data protection principles, but never preventing the sharing of information that may help protect a child.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

5.3. Responding to Child Protection Concerns

If staff are made aware of a child protection concern, they are expected to:

- listen carefully to the concern and be non-judgmental.
- only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
- not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
- be clear about boundaries and how the report will be progressed.
- record the concern on Bromcom
- inform the DSL (or deputy), as soon as practically possible.

The DSL or a deputy should always be available to discuss safeguarding concerns. There will always be a trained DSL or Deputy DSL contactable via the school's escalation protocol to ensure immediate safeguarding support. If in exceptional circumstances, a DSL is not available,

this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service

5.4. If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. For making an Early Help Referral;

https://www.kent.gov.uk/education-and-children/early-help-support-for-families#tab-2 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see section 5.1), you must tell the DSL as soon as possible. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

If a child is in immediate danger, contact the emergency services using 999.

Designated Safeguarding Leads should access the Kent Support Level Guidance from the Kent Safeguarding Children Multi-agency Partnership (KSCMP) to assess the levels of need and intervention required.

If you assess that a child/family requires intensive or specialist support, you will need to make a referral through the 'Front Door'. For more information and to access the Online Portal see the .Kent Safeguarding Children Multi-agency Partnership website

If you assess that a family's needs sit below level 3 and 4, but you would have previously considered completing an Early Help Notification, you may still wish to contact your local Early Help Team for advice about the most appropriate type of support available within the community at Support Levels 1 and 2.

Early Help and Preventative Service Contacts

A clear chronology of significant events, decisions, and actions should also be maintained on Bromcom to support effective case management and oversight.

5.5 Child on Child Abuse

We recognise that children are capable of abusing other children. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously. Behaviour between pupils will be considered carefully to determine whether it represents a behaviour matter, a safeguarding concern, or both. Where behaviour raises a safeguarding concern, it will be managed under safeguarding procedures regardless of whether action is also taken under the Behaviour Policy.

Procedures for dealing with allegations of child-on-child abuse If

a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL via Bromcom, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence. Where appropriate, information will be shared with relevant safeguarding partners in line with statutory guidance and the principles of data protection. The safety of the child will always take precedence over data confidentiality
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s). Support for victims will be prioritised, and the school will work to ensure they remain safe, supported, and engaged in education throughout the process.

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation. Staff should speak to the DSL / DDSL and log concerns on Bromcom once done so.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents. To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 5.9 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

- Children can show signs or act in ways they hope adults will notice and react to ○ A friend may make a report ○ A member of staff may overhear a conversation ○ A child’s behaviour might indicate that something is wrong.

- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.

- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

The DSL will ensure that all decisions, actions, risk assessments, and outcomes relating to any child-on-child abuse cases are recorded in writing on Bromcom and stored securely in accordance with data protection and record retention requirements.

5.6 Nude and/or Semi-Nude Image Sharing by Children

Approach based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders. This includes imagery shared via mobile devices, social media, gaming platforms, or any other online service.

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. The DSL will ensure they are familiar with the most recent UKCIS 'Sharing Nudes and Semi-Nudes' guidance and will seek advice from the Education Safeguarding Service or the police as needed.

This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)

  What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate). If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. Records will include the rationale for decisions made, actions taken, and outcomes, and will be stored securely on Bromcom in accordance with data protection principles.

The record-keeping arrangements set out in section 5.5 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSE curriculum. This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

5.7 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate. Earley Springs will work in partnership with Kent Safeguarding Children Multi-Agency Partnership (KSCMP) to ensure timely and appropriate responses to FGM concerns.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

The DSL will record all FGM-related concerns, actions, and rationale on Bromcom in accordance with the school’s record-keeping protocol (section 5.10).

How to report FGM

If you suspect a person of carrying out FGM, or think someone you know has been a victim, or may be soon, visit Kent Police How to report possible child abuse page to find a range of ways to get in touch. Alternatively, call the national FGM helpline on 0800 028 3550.

5.8 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree on a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The DSL will record all extremism and Prevent-related concerns, actions, and decisions on Bromcom in line with section 5.10 of this policy.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Executive Board can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

5.9 Reporting System

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- All classrooms have a child friendly Safeguarding Policy directing students on the process in reporting concerns.

5.10 Record Keeping

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child on Bromcom. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. All safeguarding information will be handled in accordance with UK GDPR and the Data Protection Act 2018.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records will be retained securely in accordance with the school's records retention schedule, applicable statutory requirements and current records-management guidance.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Earley Springs uses Bromcom to log concerns relating to Safeguarding. All staff receive this training as part of their staff induction.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

6. Confidentiality and Information Sharing We acknowledge that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. This approach is consistent with *Working Together to Safeguard Children (2026)*, which reinforces the importance of timely information sharing across agencies and safeguarding partners.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can, to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

Confidentiality is also addressed in this policy with respect to record-keeping in section 5.10, and allegations of abuse against staff in Appendix 3

Earley Springs has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements.

Staff must never allow concerns about data protection to prevent necessary and proportionate information sharing for the purpose of safeguarding a child. Where staff are uncertain, they should seek advice from the DSL, but uncertainty must not delay action where a child may be at risk.

7. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and the Executive Board
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

  Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum (including safe use of social media, privacy, unacceptable behaviour, and reporting cyberbullying)
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras.
- Ensure that pupils' internet use is supervised and filtered effectively.
- Explain sanctions for breaches of the Acceptable Use Policy.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to confiscate and search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment.

Filtering and Monitoring

- The DSL and the assigned member of the Executive Board responsible for Safeguarding will be responsible for procurement, documentation, annual review, and oversight.

All staff will be aware of reporting mechanisms for safeguarding and technical concerns. They should report it on Bromcom if:

- they witness or suspect unsuitable material has been accessed
- they can access unsuitable material
- they are teaching topics which could create unusual activity on the filtering logs
- there is failure in the software or abuse of the system
- there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
- they notice abbreviations or misspellings that allow access to restricted material

Earley Springs operates a filtering and monitoring process which is:

• reviewed termly by leadership;
• monitored operationally by the DSL;
• quality assured by the Executive Board Safeguarding Link;
• reviewed immediately following any safeguarding incident involving online risk.

Filtering and monitoring records are retained and reviewed to identify trends and strengthen safeguarding practice.

The DSL will record all online-safety concerns, actions and outcomes in line with the record-keeping arrangements described in section 5.10 of this policy.

The DSL will take lead responsibility for safeguarding and online safety, overseeing and acting on filtering and monitoring reports. The IT service provider will maintain systems and support reporting processes.

8. Supporting Children Potentially at Greater Risk of Harm

Whilst all children should be protected, some groups of children are potentially at greater risk of harm.

8.1 Safeguarding Children with Special Educational Needs or Disabilities (SEND)

Earley Springs recognises that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges and additional barriers can exist when recognising abuse, neglect and exploitation.

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

Earley Springs will use total-communication approaches, including visual supports, AAC systems and SCERTS-based strategies, to help pupils express concerns and disclose worries, ensuring communication differences never become a barrier to safeguarding.

8.2 Children Requiring Mental Health Support

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 5.2.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree on a course of action.

Earley Springs has a suitably trained Designated Mental Health Lead and Mental Health First Aider to coordinate early identification and support. Staff may refer to the DfE guidance ‘Mental Health and Behaviour in Schools’ (2018, updated 2023).

Staff may Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

Self-Harm & Suicide

Earley Springs recognises that suicide is a leading cause of death among young people and that the school plays a crucial role in prevention. We acknowledge that:

- Thoughts of self-harm and suicide are relatively common among young people.
- Suicide is complex, and each case has individual contributing factors.
- Stigma surrounding mental illness and self-harm can prevent both disclosure and help-seeking.

Through staff training and the presence of a Mental Health First Aider, we will ensure that adults in school can identify when a pupil may be struggling with suicidal thoughts.
Talking about suicide does not increase risk; sensitive, open conversations can provide relief and connection.

Earley Springs will:

- Include self-harm and suicide awareness in all staff inductions.
- Ensure all staff understand their safeguarding responsibilities for suicide prevention.
- Emphasise that staff must always believe and act upon pupil disclosures.
- Recognise that preserving life overrides confidentiality: any concerns must be reported immediately to the DSL or Mental Health Lead.
- Record concerns on Bromcom, including suspected suicidal ideation.
- Dial 999 if a pupil is in crisis or immediate danger.
- Work in partnership with KSCMP and local mental-health services in the event of a serious incident.
- Provide post-incident support for pupils, staff and peers, signposting to the Samaritans and counselling services.
- Coordinate a Team Around the Child meeting to plan a safe, supported return to school.

8.3. Children Missing from Education

Children missing from education can be at risk of abuse, neglect, sexual or criminal exploitation.

Earley Springs will maintain its admission and attendance registers and fulfil its statutory notification and safeguarding responsibilities in accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, current DfE statutory attendance guidance and Kent local procedures.

The Designated Safeguarding Lead (DSL) will ensure that absences are followed up promptly, recorded on Bromcom, and that unexplained or persistent absence is escalated in accordance with local safeguarding procedures.

8.4. Children with a Social Worker

Some pupils have a social worker due to safeguarding or welfare needs.
We understand that adversity and trauma can create additional vulnerabilities and may affect attendance, behaviour, learning and mental health.

The DSL and staff will work closely with social workers to protect and support these pupils. Where a pupil has a social worker, this will always inform school decisions regarding:

- Responses to unauthorised absence or missing education where safeguarding risks exist.
- The planning of pastoral, therapeutic or academic support.

8.5 Children in Care and Previously in Care

Earley Springs will ensure that staff have the skills, knowledge and understanding to keep children in care and previously in care safe. In particular, we will ensure that:

- Appropriate staff have relevant information about each child's legal status, contact arrangements with parents or those holding parental responsibility, and care arrangements.
- The DSL has details of each child's social worker and the relevant Virtual School Head (VSH), and will liaise with the Kent Virtual School and local authority to support continuity of care, pastoral support, and educational progress.
- The DSL will work in partnership with the Virtual School and other agencies to promote high aspirations and positive outcomes for children in care and those previously in care.

9. Notifying parents or carers

Where appropriate, concerns about a child will be discussed with parents or carers. The DSL will normally lead such discussions in the event of a suspicion or disclosure.
Other staff will not contact parents or carers without prior consultation with the DSL.

If notifying parents or carers is considered to increase risk to the child, the DSL will seek advice from children's social care before doing so. All decisions and rationales will be recorded on Bromcom.

In cases of child-on-child abuse, the school will normally notify the parents or carers of all pupils involved. Information will be shared carefully and proportionately, in consultation with the police and/or children's social care, to ensure the safety and privacy of all children.

The DSL, together with relevant agencies, will:

- Meet with the victim's parents or carers (and, where appropriate, the victim) to discuss safeguarding arrangements and desired support.
- Meet with the alleged perpetrator's parents or carers to discuss support, any safety measures (such as adjusted timetables), and the rationale behind these decisions.

10. Complaints and concerns about school safeguarding policies

10.1. Complaints against staff

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, you must report it to the Executive Board.

In case of any familial connections speak to deputy DSL, or a member of the Executive Board not related to the Headteacher.

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3). Where safeguarding concerns or allegations relate to the Headteacher, the DSL will report directly to the Executive Board Safeguarding Link Lead or the Chair of the Executive Board, and the Headteacher will take no part in decision-making.

Where there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, it must be reported directly to the Local Authority Designated Officer (LADO).
In Kent, the LADO service can be contacted via the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) website or by calling 03000 410888.

Concerns or allegations that may meet the harm threshold will be managed in accordance with Part Four of KCSIE 2026. The Headteacher, or appropriate case manager, will contact the LADO without delay where the threshold may be met or where advice is required. Concerns that do not meet the harm threshold will be managed under the school's low-level concerns procedure.

10.2. Other complaints

The DSL/Headteacher, will lead on complaints relating to pupils, safeguarding practice, or policy implementation.

All complaints will be recorded and managed in line with the school's Complaints Policy and Safeguarding Policy.

10.3 Whistle-blowing

Staff are encouraged to report any concerns regarding poor or unsafe safeguarding practice, or potential failures in the school's safeguarding systems.

If you believe Earley Springs may be putting children at risk, even if you are uncertain, you are encouraged to contact the NSPCC Whistleblowing Advice Line for free advice and support.

Contact Details:

- Website: NSPCC Whistleblowing Advice Line
- Email: help@nspcc.org.uk
- Telephone: 0800 028 0285

This line was commissioned by the Home Office in response to the Government's Tackling Child Sexual Exploitation report (HM Government, 2015), and provides confidential advice for professionals concerned about how safeguarding issues are being managed.

Staff can also contact the Department for Education's Whistleblowing Advice Line:

- Telephone: 0300 123 3155
- Email: whistleblowing.education@education.gov.uk

These services do not replace internal procedures. Wherever possible, staff should raise concerns through the school's own reporting systems in the first instance. Further guidance is available on the GOV.UK whistleblowing webpage, https://www.gov.uk/whistleblowing

11. Training

11.1 All staff

All staff members will undertake safeguarding and child protection training at induction to ensure that they:

- Understand the school's safeguarding systems and procedures.
- Recognise their statutory responsibilities and the signs and indicators of abuse or neglect.
- Know how to respond appropriately to concerns about the safety or welfare of a child.

This induction training will include:

- The school's Safeguarding and Child Protection Policy, Whistle-blowing Policy, Staff Code of Conduct, and Online Safety policy.

- Specific instruction on how to record and report concerns using Bromcom.

- Training delivered via The National College online training platform, ensuring consistency with current national guidance and best practice.

All staff will receive a copy of this policy and will be required to read and confirm their understanding of Part One of *Keeping Children Safe in Education (2026)*. Staff must sign to confirm that they have read, understood, and will follow its requirements.

Safeguarding and child protection training will be:

- Regularly updated, at least annually, and more frequently if required by changes to statutory guidance or local arrangements.
- Integrated and aligned with the whole-school approach to safeguarding, staff development, and curriculum planning.
- Delivered in line with guidance from the three safeguarding partners – *Kent County Council (Children's Services), NHS Kent and Medway Integrated Care Board, and Kent Police* – through the Kent Safeguarding Children Multi-Agency Partnership (KSCMP).
- Informed by the Teachers' Standards (2012), supporting the expectation that all teachers:
    - ○ Manage behaviour effectively to ensure a good and safe environment. ○ Have a clear understanding of the needs of all pupils.

All staff will also receive training on the government's Prevent strategy to enable them to identify children at risk of radicalisation and to challenge extremist ideas.
Regular safeguarding and child protection updates, including on online safety, will be provided as required but at least annually (for example, through staff meetings, bulletins, and briefings).

Contractors, supply staff, and other professionals who work regularly on site will receive safeguarding information appropriate to their role, including the identity and contact details of the DSL and the procedures for reporting concerns.

Volunteers working directly with pupils will receive proportionate safeguarding training and will be expected to read the school's safeguarding policies and confirm their understanding before starting their role.

The Designated Safeguarding Lead (DSL) will maintain accurate and up-to-date records of all staff safeguarding training, including confirmation of policy receipt and evidence that staff have read and understood Part One of *Keeping Children Safe in Education (2026)*.

11.2 The Designated Safeguarding Lead (DSL) and Deputy DSLs

The Designated Safeguarding Lead (DSL) and Deputy DSLs will undertake formal, accredited child protection and safeguarding training that provides them with the knowledge and skills required to carry out their role effectively.

- This training will be updated every 2 years in line with statutory requirements.

- In addition, the DSL and deputies will refresh and update their knowledge and skills at regular intervals, and at least annually, through a range of activities such as attending DSL network meetings, reviewing national and local safeguarding updates, participating in professional learning, and reading current safeguarding research and guidance.
- The DSL and deputies will also complete Prevent awareness training and will keep this knowledge up to date.
- The DSL will ensure they are familiar with local safeguarding arrangements as set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP), and that they engage with the three safeguarding partners:
    - Kent County Council (Children's Services)
    - NHS Kent and Medway Integrated Care Board (ICB)
    - Kent Police

Records of all DSL and Deputy DSL training will be maintained securely by the DSL and reviewed regularly by the Executive Board to ensure continued compliance.

11.3 Executive Board

All Executive Board members will receive appropriate safeguarding and child protection training at induction, which will be regularly updated. They will understand the requirements of Part Two of KCSIE 2026 relevant to governance and strategic safeguarding oversight and will receive sufficient information and training to provide effective challenge and assurance regarding the school's safeguarding arrangements.

This training ensures that Executive Board members:

- Have the knowledge, skills, and understanding necessary to perform their strategic safeguarding functions and fulfil their duties under *Keeping Children Safe in Education (2026)* and the *Independent School Standards (Part 3)*.
- Are able to provide strategic challenge and oversight to ensure that safeguarding policies and procedures are effective, consistent with local authority and multi-agency guidance, and embedded across the school.
- Understand their statutory responsibilities for promoting the welfare of children, including oversight of safer recruitment, allegations management, and online safety.
- Are familiar with the role and responsibilities of the Designated Safeguarding Lead (DSL), and understand the arrangements for dealing with allegations against staff, including how low-level concerns are managed.
- Receive specific training in managing allegations, as the Executive Board may be required to act as the *"case manager"* in the event that an allegation of abuse is made against the Headteacher.

Executive Board members will be provided with the sections of KCSIE 2026 relevant to their responsibilities and will receive sufficient training and information to enable them to understand and discharge their safeguarding oversight responsibilities effectively.

Executive Board safeguarding training will be refreshed in line with updates to statutory guidance and local arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP).
Records of Board member safeguarding training and confirmation of KCSIE Part 2 completion will be maintained by the DSL and reviewed annually.

11.3 Recruitment – interview panels

At least one person involved in any recruitment and selection process, including shortlisting and interview panels, will have completed accredited safer recruitment training.

This training will:

- Be up to date and refreshed in line with guidance from the Department for Education (DfE) and the Kent Safeguarding Children Multi-Agency Partnership (KSCMP).
- Cover, as a minimum, the content and expectations outlined in Keeping Children Safe in Education (2026), including the school's duty to prevent unsuitable people from working with children.
- Ensure those involved in recruitment understand how to identify safeguarding concerns and apply safer recruitment principles throughout the process, from advertisement and application to appointment and induction.

This requirement applies to all roles within the school workforce, including teaching, support, volunteer, contractor and governance positions.

12. Physical Safety

12.1. Use of 'reasonable force'

There may be circumstances where it is appropriate for staff to use reasonable force in order to safeguard children from harm. Any use of reasonable force will always be proportionate, necessary, and in the best interests of the child.

Further information regarding our approach, expectations, and reporting procedures can be found in our Physical Intervention Policy, which is included within our Behaviour Policy. All staff receive guidance on the use of reasonable force and physical intervention as part of their safeguarding and behaviour management training.

12.2. Site Security

Earley Springs is committed to providing a safe and secure environment for all pupils, staff, volunteers and visitors.
Full details of the school's arrangements can be found in our Site Access and Security Policy.

- All members of staff share responsibility for maintaining awareness of building and grounds security, challenging unidentified individuals, and

promptly reporting any concerns to the Designated Safeguarding Lead (DSL) or senior leadership team.

- Appropriate checks will be undertaken for all visitors and volunteers in accordance with Keeping Children Safe in Education (2026), local safeguarding procedures, and the Independent School Standards.
- All visitors must sign in on arrival, wear appropriate identification and be supervised in accordance with the purpose of their visit, the school's visitor procedures and an assessment of safeguarding risk.
- Any individual who is not known or identifiable on site should be appropriately challenged to confirm their purpose.
- The school will not tolerate any behaviour from individuals (including parents or members of the public) that threatens school security, compromises safeguarding, or causes others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in the restriction or withdrawal of access to the school site.

Earley Springs has implemented a range of environmental and operational safeguarding measures to promote the safety, security and wellbeing of all pupils, staff and visitors across the school site. These arrangements include magnetic locking systems on external access points to manage entry and exit, digitally restricted access to identified high-risk areas including kitchen facilities, and CCTV coverage across communal areas in accordance with UK GDPR and data protection requirements. Robust visitor management procedures are in place, including sign in and sign out processes and appropriate supervision arrangements where required. Access between teaching environments is controlled to support safeguarding and minimise unauthorised movement around the site. In addition, specialist environments, including sensory spaces, immersive learning environments and soft play facilities, are subject to individual safeguarding and risk assessments to ensure that all environments remain safe, supportive and appropriate to meet pupils' needs.

Earley Springs complies with the Fire Safety (England) Regulations 2022, ensuring regular fire-risk assessments, documented evacuation plans, and staff fire-safety training as part of our health and safety duties under the Independent School Standards (Part 3).

13. Monitoring arrangements

This policy will be reviewed at least annually, and earlier where there is a change to legislation, statutory guidance, local safeguarding arrangements or school practice, or where a safeguarding incident identifies a need for review. The Executive Board will approve the policy and provide strategic oversight and challenge regarding its effective implementation.

14. Child in Care / Designated Teacher

Earley Springs is committed to promoting the educational achievement, safeguarding and wellbeing of Children in Care (CIC) and Previously in Care (PCIC).
This aligns with the *Children and Social Work Act 2017*, *KCSIE 2026*, and *ISS Part 3* (7a–b).

14.1. Definitions

- Children in Care (CIC): Children who are under the care of the local authority, either through a care order or a voluntary agreement under section 20 of the Children Act 1989. This includes children placed in foster care, residential homes, or with connected carers under supervision.
- Previously in Care (PCIC): Children who were previously looked after by the local authority but have since been adopted, are under a special guardianship order, or are subject to a child arrangements order.

14.2. Aims

Earley Springs is dedicated to ensuring that all CIC and PCIC:

- Receive equal access to high-quality education and enrichment opportunities.
- Are supported to achieve their full academic and personal potential.
- Have access to a nurturing environment that prioritises emotional wellbeing and stability.
- Benefit from close collaboration between the school, carers, social workers, Virtual School Heads, and external agencies to ensure consistent and coordinated support.

14.3. Role of the Designated Teacher

The Designated Teacher has statutory responsibility for promoting the educational achievement of CIC and PCIC by:

- Ensuring all staff understand the needs of CIC and PCIC and how to support them effectively.
- Overseeing the development, implementation, and review of Personal Education Plans (PEPs).
- Monitoring academic progress, attendance, and wellbeing, ensuring that targeted interventions are provided where needed.
- Liaising closely with the Virtual School Head (VSH), carers, social workers, and external agencies to promote holistic support.
- Working with the SENCO and DSL to ensure safeguarding and educational plans are integrated.

14.4. Identity of the Designated Teacher

The Designated Teacher for Children in Care and Previously in Care at Earley Springs is:

Harriet Carter
Designated Teacher harriet@earleyspringsschool.com

Harriet is responsible for coordinating all educational provision, progress tracking, and inter-agency communication for CIC and PCIC pupils, ensuring compliance with statutory guidance and best practice

14.5. Executive Board Responsibilities

The Executive Board at Earley Springs School is committed to ensuring that the Designated Teacher is adequately supported and equipped with the necessary training and resources to carry out their role effectively. The Board is also responsible for monitoring the effectiveness of the support provided to CIC and PCIC, ensuring that all statutory duties are met. This policy will be reviewed biennially to ensure it remains in line with best practices and statutory requirements.

For further information or to discuss specific concerns related to this policy, please contact

officeadmin@earleyspringsschool.com.

Appendix 1: Types of Abuse

(Based on Department for Education statutory guidance, Keeping Children Safe in Education 2026)

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by a single definition or label. In most cases, multiple issues will overlap.

All staff should be aware that abuse, neglect and safeguarding concerns can happen to any child, and that children with special educational needs, disabilities or communication difficulties may face additional barriers to recognising or reporting abuse.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.
Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child so as to cause severe and adverse effects on their emotional development.
Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless, unloved, or valued only insofar as they meet the needs of another person
- Preventing the child from expressing their views, deliberately silencing them, or mocking how they communicate
- Imposing age- or developmentally-inappropriate expectations on children, such as interactions beyond a child's developmental capability, overprotection, limiting exploration and learning, or preventing normal social interaction
- Seeing or hearing the ill-treatment of another person
- Serious or persistent bullying (including online/cyberbullying), causing children to feel frightened or in danger, or the exploitation and corruption of children

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child understands what is happening.

The activities may include:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing
- Non-contact activities, such as involving children in looking at or producing sexual images, watching sexual activities, encouraging sexually inappropriate behaviour, or grooming a child in preparation for abuse (including online)

Sexual abuse is not solely perpetrated by adult males; women and other children can also commit acts of sexual abuse.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.
Neglect may occur during pregnancy as a result of maternal substance misuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing or shelter (including exclusion from home or abandonment)
- Protect a child from physical or emotional harm or danger
- Ensure adequate supervision (including the use of inappropriate caregivers)
- Ensure access to appropriate medical care or treatment

Neglect may also include unresponsiveness to a child's basic emotional needs.

Appendix 2: Safer Recruitment and DBS checks – Policy and Procedures

Purpose and Legal Framework

Earley Springs is committed to safeguarding and promoting the welfare of all pupils. We follow safer recruitment practices to ensure that all adults working or volunteering in the school are suitable to do so.
This appendix aligns with:

- *Keeping Children Safe in Education (KCSIE 2026)*
- *The Independent School Standards (Part 3 and Part 4)*
- *The Education (Independent School Standards) Regulations 2014*
- *The Childcare (Disqualification) Regulations 2018*
- *The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended)*

All staff involved in recruitment will have received accredited Safer Recruitment Training.

Recruitment and Selection

Advertising

All advertisements for roles at Earley Springs will clearly state:

- Our commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding responsibilities and level of contact with children associated with the post
- Whether the role is exempt from the *Rehabilitation of Offenders Act 1974*

Application and Shortlisting

Applicants must complete the school's official application form, including a self-declaration of criminal history and any information that may make them unsuitable to work with children.
Shortlisting will always involve at least two trained staff members and will:

- Explore employment gaps or inconsistencies
- Review self-disclosure information before interview
- As part of due diligence, Earley Springs will consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online which the school may wish to explore with the applicant at interview.

References

Before interview, we will:

- Obtain at least two references, including one from the current or most recent employer

- Verify all references directly with the referee (no open references accepted)
- Compare references with the application form and follow up on inconsistencies
- Confirm accuracy of references with the headteacher/principal when school-based

Interview and Selection

At interview, at least one trained member of the panel will ask questions exploring:

- The candidate's understanding of safeguarding and child protection
- Any gaps in employment history or anomalies in references
- Motivation to work with children and understanding of professional boundaries All decisions and assessment records will be documented.

Pre-Appointment Vetting Checks

All offers of appointment are conditional until satisfactory completion of required pre-employment checks. These will be recorded on the Single Central Record (SCR) and held in individual personnel files.

We will verify:

- Identity (including photographic ID and proof of address)
- Enhanced DBS certificate with barred list information (if in regulated activity)
- Separate barred list check where necessary before DBS certificate is received
- Right to work in the UK (retained for employment duration + 2 years)
- Qualifications (as relevant to the role)
- Medical fitness to perform duties
- Prohibition from teaching (DfE Teacher Services check)
- Prohibition from management (Section 128) where applicable
- Overseas checks for candidates who have lived or worked outside the UK, including criminal record checks or confirmation from professional regulatory authorities

Copies of DBS certificates will not be retained longer than six months. We will keep a record of the date, reference number, and outcome of each check.

Regulated Activity

- Earley Springs will determine whether a role constitutes regulated activity with children in accordance with the Safeguarding Vulnerable Groups Act 2006, as amended, KCSIE 2026 and current Disclosure and Barring Service guidance. From 1 September 2026, the previous supervision exemption from regulated activity with children no longer applies. The school will therefore assess the nature and frequency of each role carefully and undertake the appropriate level of DBS and children's barred-list checks before an individual undertakes regulated activity.

Existing Staff

> Further checks on existing staff will be undertaken where required by law, where an individual's role changes in a way that affects the checks required, or where the school has concerns about an individual's suitability to work with children.

The school will refer to the Disclosure and Barring Service (DBS) anyone who has harmed or poses a risk of harm to a child, or who would have been removed from regulated activity had they not left.

Agency and Third-Party Staff

We will obtain written confirmation from any agency or third-party provider that all appropriate safer recruitment checks (including DBS and barred list) have been completed. We will also verify the identity of the individual presenting for work.

Contractors

All contractors or their employees working on site will be checked at the appropriate level:

- Enhanced DBS with barred list if in regulated activity
- Enhanced DBS (without barred list) if work provides regular contact but not regulated activity

Contractors without completed checks will be supervised at all times. We will verify the identity of all contractors and record details on site.

Volunteers

Earley Springs will undertake appropriate safer recruitment checks for volunteers in accordance with KCSIE 2026 and current DBS requirements. From 1 September 2026, the previous supervision exemption from regulated activity with children no longer applies. A person who carries out regulated activity with children may therefore be in regulated activity irrespective of whether they are supervised.

Where a volunteer is undertaking regulated activity, Earley Springs will obtain an enhanced DBS certificate including children's barred-list information before the individual undertakes that activity. Where a volunteer is not undertaking regulated activity, the school will undertake a documented risk assessment to determine the appropriate level of checks and supervision.

The school will not knowingly permit a barred person to engage in regulated activity with children.

Trainee and Student Teachers

- Where trainee teachers are employed by the school, all required checks will be carried out by Earley Springs.
- Where trainees are fee-funded, we will obtain written confirmation from the training provider that the necessary checks have been completed.

All Executive Board Members, Proprietors, and Trustees will have:

- Enhanced DBS checks (with barred list information if in regulated activity)
- Section 128 checks (prohibition from management)
- Identity verification
- Right to work in the UK
- Overseas checks, where applicable

Appendix 3: Allegations of Abuse Made Against Staff

Scope

This procedure applies to all adults working in, or on behalf of, Earley Springs School – including employees, supply staff, contractors, volunteers and Executive Board members.

It covers:

- Allegations that meet the harm threshold (where a child may have been harmed or at risk of harm); and
- Low-level concerns, where conduct falls below expectations but does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

Allegations That May Meet the Harm Threshold

An allegation meets the harm threshold if an adult has:

- Behaved in a way that has harmed or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child in a way that indicates they may pose a risk of harm; or
- Behaved in a way that indicates they may not be suitable to work with children (including behaviour outside school).

If unsure, the case manager will consult the LADO without delay.

Immediate Actions

- Report all allegations immediately to the Headteacher.
- If the allegation concerns the Headteacher, report directly to the Chair of the Executive Board (or a non-related member if a conflict exists).
- No internal investigation should begin until the LADO has been consulted.

- The case manager (Headteacher or Chair) will record the allegation, consult the LADO and follow agreed actions, including any referral to police or children's social care.

Suspension will only be used where necessary to protect children or preserve the integrity of an investigation, and only after discussion with the LADO.

Support, Confidentiality and Record-Keeping

- Both the child(ren) and staff member will be offered appropriate support.
- Information will be shared only on a need-to-know basis.
- The case manager will keep clear, dated records of all discussions, decisions and actions.
- Substantiated allegations will remain on file; malicious or false allegations will be removed.

- Records will be retained for 10 years or until normal retirement age, whichever is longer.

Referral and Outcomes

Where the investigation finds that an individual:

- Harmed or posed a risk of harm → referral to the Disclosure and Barring Service (DBS); and
- Is a teacher → referral to the Teaching Regulation Agency (TRA) where appropriate.

Outcomes will be categorised as substantiated, false, malicious, unsubstantiated, or unfounded, in line with KCSIE.

Supply, Agency or Contracted Staff

For staff employed via an agency or third-party:

- The Headteacher will inform both the agency and the LADO immediately.
- The school will lead the information gathering and cooperate fully with the agency.
- The agency must be informed of the outcome so records can be updated.

Low-Level Concerns

A low-level concern is any behaviour that is inconsistent with the Staff Code of Conduct but does not meet the harm threshold (for example: being over-familiar, using poor language, or breaching boundaries).

Staff are expected to report low-level concerns to the Headteacher (or to the Executive Board if about the Headteacher). All concerns will be:

- Logged securely with date, context, action and rationale;

- Reviewed to identify any patterns; and
- Escalated to the LADO if patterns suggest a risk of harm.

Low-level concerns will not appear in references unless they are substantiated and meet the threshold for disclosure.

Non-Recent Allegations

All historic allegations, whether from a current or former pupil, will be reported to the LADO and, if appropriate, to the police.

Learning Lessons

After any case, the Headteacher and Executive Board will review outcomes with the LADO to identify any improvements in procedure, culture or training.

Oversight and Review

- The Headteacher (or Chair when relevant) acts as case manager.
- The Executive Board holds strategic oversight to ensure compliance with KCSIE and ISS.
- This appendix is reviewed annually or following any safeguarding incident.

Appendix 4: Specific Safeguarding Issues

Children Missing from Education (CME)

- Risk: CME (especially repeatedly) may indicate abuse/neglect, CSE/CCE, FGM/forced marriage, radicalisation, mental-health harms.
- Staff must: follow absence/escalation steps in Section 5, notify DSL immediately where risk is suspected.
- School will: follow LA CME procedures; notify LA when a pupil leaves with no destination; share information lawfully.
- Kent routes: DSL uses KSCMP and PIAS processes.

Child Criminal Exploitation (CCE) & County Lines

- Definition: Coercion/control of a child for criminal gain (e.g., moving drugs/money, forced theft), in person or online. Apparent “consent” is not consent.
- Indicators (examples): new/unexplained goods, going missing, changed peers/routine, decline in engagement, substance misuse, fear.
- Action: staff inform DSL; DSL follows KSCMP pathway and refers to children’s social care and police where appropriate.

Child Sexual Exploitation (CSE)

- Definition: Sexual abuse for something the child needs/wants or offender's gain; can be online/offline; may look "consensual". ● Extra indicators: STIs/pregnancy; older "boyfriend/girlfriend".
- Action: staff → DSL; DSL follows KSCMP pathway and refers as required.

Child-on-Child Abuse (incl. Sexual Violence & Sexual Harassment)

- Zero-tolerance. Can occur in/out of school, online/offline; includes bullying (incl. prejudice-based), physical abuse, sexual violence/harassment, consensual/non-consensual sharing of nudes/semi-nudes, upskirting, initiation/hazing.
- Staff must: follow Section 5. Reassure/report, do not promise secrecy.
- Response: risk assessment; support for *all* children involved; consider patterns/culture; follow Sections 5.5–5.6for SV/SH specifics. Some groups (e.g., girls, SEND, LGBT) face higher risk.

Domestic Abuse

- Note: Children witnessing/experiencing domestic abuse are victims.
- Staff must: inform DSL on any concern (changes in behaviour, attendance, wellbeing).
- DSL: records, liaises with safeguarding partners, arranges support/early help or referral.

So-called 'Honour-Based' Abuse (HBA), including FGM & Forced Marriage

- HBA: Abuse to "protect honour"; may involve multiple perpetrators. Treat it as abuse.
- FGM: illegal; mandatory duty for teachers to report known cases on under-18s directly to police (101/999)and inform DSL (see Section 5.7).
- Forced Marriage: criminal offence. Staff apply the 'one-chance' rule: immediate DSL involvement; DSL seeks advice from the Forced Marriage Unit and follows KSCMP.

Preventing Radicalisation (Prevent)

- Duty: prevent pupils being drawn into terrorism; risk can be local and online.
- Training: DSL and staff receive Prevent awareness.
- Controls: curriculum, pastoral support, robust filtering/monitoring (see Section 7), and proportionate risk assessment.
- Action: concerns → DSL; DSL may refer to Channel/children's social care/police. Staff always act if worried.

Serious Violence

- Indicators (examples): increased absence, association with older peers, unexplained injuries/gifts, wellbeing decline.
- Action: staff → DSL; DSL uses KSCMP pathways; consider CCE overlap.

Online Safety / Nude & Semi-Nude Images

- Approach: follow the school's online safety procedures (Section 7) and the UKCIS guidance for responding to incidents (Section on Nude/Semi-Nude).
- Staff must not: view/copy/share/delete the imagery; must report to DSL immediately.
- DSL: completes risk assessment, contacts police/children's social care where thresholds met, records decisions.

Homelessness

- Risk: homelessness or risk thereof harms welfare.
- DSL/Deputy: know local housing referral routes; refer to children's social care where harm/risk of harm.

Visitors & Visiting Speakers (Site Security)

- All visitors: identity verified, sign-in, wear badge; supervised if unchecked.
- Professionals: prior written confirmation of appropriate DBS from their organisation (ID still verified).
- Speakers: due diligence; no platforming of extremist views.

Non-collection of Children

- If not collected: follow contact cascade; dynamic risk assessment; escalate to police/children's social care if safety concerns. (Keep brief, school to maintain a separate local procedure.)

Missing Pupils on Site / Absconding

- Immediate search and notification per the school's Absconding/Behaviour procedure; inform parents and police/LA as required; record incident and review controls.

NB: The Proprietor (Earley Springs Ltd) retains ultimate responsibility for compliance with the Independent School Standards and delegates day-to-day management to the Headteacher, under the oversight of an independent Executive Board.